

EXHIBIT A

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Attorneys for Specially Appearing Defendant
Kabushiki Kaisha LegalOn Technologies, f/k/a Kabushiki Kaisha LegalForce

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

LEGALFORCE RAPC WORLDWIDE, P.C.

Plaintiff,

v.

LEGALFORCE, INC.,

Defendant.

CASE NO.: 3:22-cv-03724-TLT

**DEFENDANT'S OBJECTIONS AND
RESPONSES TO PLAINTIFF'S FOURTH
SET OF REQUESTS FOR PRODUCTION**

1 **PROPOUNDING PARTY:** LegalForce RAPC Worldwide, P.C.

2 **RESPONDING PARTY:** Specially Appearing Defendant *Kabushiki Kaisha* LegalOn Technologies,
3 f/k/a *Kabushiki Kaisha* LegalForce

4 **SET NUMBER:** Four

5 TO PLAINTIFF AND ITS ATTORNEYS OF RECORD:

6 Pursuant to Rules 26 and 34, Federal Rules of Civil Procedure and the Local Civil Rules of the
7 United States District Court for the Northern District of California, Specially Appearing Defendant
8 *Kabushiki Kaisha* LegalOn Technologies, f/k/a *Kabushiki Kaisha* LegalForce, Inc. (“Defendant”),
9 through its counsel, hereby responds and objects to Plaintiff LegalForce RAPC Worldwide, P.C.’s
10 (“Plaintiff”) Fourth Set of Requests for Production (the “Requests,” served on June 30, 2023.

11 Defendant provides these Responses, and any document produced in response to the Requests,
12 without waiver of or prejudice to (i) its right at any later time to raise objections as to the relevance,
13 materiality, privilege, work-product character or admissibility as evidence, for any purpose, of (a) the
14 Requests or any part thereof, (b) statements made in these Responses to the Requests or any part
15 thereof, or (c) any information disclosed and/or any documents produced as part of Defendant’s
16 Responses to the Requests or any part thereof; (ii) its right to object to the use of any documents
17 produced in response to these Requests in any subsequent proceedings or the trial of this Action or
18 any other action; or (iii) its right to object on any ground at any time to a demand for further response
19 to these Requests or other discovery requests in this Action. Any response or objection or agreement
20 to search for and produce in response to an individual Request is not an acknowledgement or
21 concession that the documents sought exist or are in Defendant’s possession, custody or control.

22 Defendant reserves the right to amend or supplement its responses and objections to the
23 Requests from time to time as appropriate.

24 **GENERAL OBJECTIONS**

25 1. The General Objections set forth below apply to the Requests generally and to the
26 Definitions, Instructions and the Individual Requests set forth therein. Unless otherwise stated, the
27 General Objections shall have the same force and effect as if set forth in full response to each
28 Definition and Instruction and Request.

1 2. Defendant objects generally to the Requests, including the Definitions and Instructions
2 set forth therein, to the extent that they seek to impose burdens or obligations on Defendant that are
3 broader than, inconsistent with or not authorized under the Federal Rules of Civil Procedure, the Local
4 Rules of the United States District Court for the Northern District of California, other applicable rules
5 or laws, or any order entered by the Court in, or applicable to, this Action (the “Applicable Rules”).
6 Subject to and without waiving any Objections, in responding to these Requests, Defendant will
7 construe the Requests in accordance with the Applicable Rules.

8 3. Defendant objects generally to the Requests, including the Definitions and Instructions
9 set forth therein, on the grounds that they seek documents or information that come within the scope
10 of the attorney-client privilege, the work-product doctrine, the common interest or joint defense
11 privilege or any other applicable privilege or immunity, or that otherwise are exempted from disclosure.
12 Defendant hereby claims such privileges and protections to the extent implicated by the Requests and
13 excludes privileged or protected material from its responses to the Requests. Any disclosure of such
14 privileged or protected material in response to the Requests is inadvertent and not intended to waive
15 those privileges and protections. Defendant reserves the right to demand that Plaintiff return, destroy
16 or sequester any privileged or protected documents produced and all copies thereof consistent with the
17 Applicable Rules.

18 4. Defendant objects generally to the Requests, including the Definitions and Instructions
19 set forth therein, to the extent they purport to require Defendant to produce documents without any
20 date restriction and therefore seek documents that are not relevant to any party’s claim or defense or
21 proportional to the needs of the case.

22 5. Defendant objects generally to the Requests, including the Definitions and Instructions
23 set forth therein, to the extent that they seek documents that are cumulative or duplicative.

24 6. Defendant objects generally to the Requests, including the Definitions and Instructions
25 set forth therein, to the extent that they purport to require Defendant to conduct anything beyond a
26 reasonable and diligent search for readily accessible documents (including electronic documents) from
27 readily available sources (including electronic sources) where responsive documents reasonably
28 would be expected to be found, and to the extent that the Requests purport to require Defendant to

1 exceed its obligations under the Applicable Rules.

2 7. Defendant objects generally to the Requests, including the Definitions and Instructions
3 set forth therein, to the extent that they purport to impose an obligation to produce any information or
4 documents that are newly created or received after the receipt of Requests, because efforts to produce
5 such information or documents would be unduly burdensome and require unreasonable expense.

6 8. Defendant objects generally to the Requests, including the Definitions and Instructions
7 set forth therein, to the extent that they purport to require Defendant to draw subjective or legal
8 conclusions, or are predicated on subjective or legal conclusions or arguments. Subject to and without
9 waiving any objections, Defendant states that any response, production of documents or provision of
10 information in response to the Requests is not intended to provide, and shall not constitute or be
11 construed as providing, an admission concerning any of the terms used in the Requests.

12 9. Defendant objects generally to the Requests, including the Definitions and Instructions
13 set forth therein, to the extent that the Requests, Definitions or Instructions contain inaccurate,
14 incomplete or misleading descriptions of the facts, persons, relationships and/or events underlying the
15 Action. Defendant further objects to the Requests, including the Definitions and Instructions set forth
16 therein, to the extent that they assume the existence of facts that do not exist or the occurrence of
17 events that did not take place. Any response, production of documents or provision of information in
18 response to the Requests is not intended to provide, and shall not constitute or be construed as
19 providing, an admission that any factual predicates stated in the Requests are accurate.

20 10. Defendant objects generally to the Requests to the extent that the Requests purport to
21 require production of documents within 30 days on the grounds that such a request is unreasonable
22 and unduly burdensome.

23 11. Defendant object generally to Definition No. 3, defining the term “LegalOn Japan” as
24 vague, over-broad and, as used in the Requests, calling for material not relevant to claims or defenses
25 of either party to Action to the extent that it encompasses Defendant’s “contractors.” Unless otherwise
26 stated, Defendant will interpret “You”, “Your” and “LegalOn Japan” to include only *Kabushiki Kaisha*
27 LegalOn Technologies, f/k/a *Kabushiki Kaisha* LegalForce and its employees.

28 **SPECIFIC OBJECTIONS AND RESPONSES**

Defendant submits the following Specific Objections and Responses to the Requests. The absence of a Specific Objection to a Request is not an admission that documents responsive to the Request exist. Moreover, Defendant hereby incorporates its General Objections into the Responses set forth below.

REQUEST FOR PRODUCTION NO. 94:

Documents sufficient to show the amount of venture capital that You have raised from investors headquartered in the United States of America.

RESPONSE TO REQUEST FOR PRODUCTION NO. 94:

Defendant objects to this Request to the extent that it seeks documents protected by attorney work product and/or attorney-client privilege. Defendant additionally objects to this Request based on the grounds that it is premature, call for production of confidential and proprietary information and documents absent entry of a stipulated protective order, and call for electronically stored information absent entry of a stipulated order regarding discovery of electronically stored information for litigation. Defendant further objects to this Request with respect to the language “venture capital” and “headquartered” based on the grounds that it overly broad and unduly burdensome as it is not limited in the subject matter, not limited to the U.S. jurisdiction, and not tied to the claims or defenses in this case. Defendant further objects to this Request as vague and ambiguous with respect to the language “venture capital” and “headquartered” on the grounds that it relies on the interpretation of terms that are undefined. Defendant objects to this Request to the extent that it falsely suggests that Defendant had any plan or activity to enter the U.S. market using the LEGALFORCE name or mark. Defendant further objects to this Request as it is compound and assumes facts not in evidence and calling for speculation when it asks Defendant to identify the supposed headquarters of its investors. Defendant further objects to this Request in that it calls for highly confidential information—the specific amounts invested by specific investors—when there is no protective order in this action.

Defendant also objects to the Request given that jurisdictional discovery has closed and/or is inappropriate pending a determination from the Court whether it has Article III jurisdiction here.

Defendant will withhold responding to this Request on these bases.

1 Dated July 29, 2023

By: /s/Christopher Studebaker
Christopher Studebaker (admitted *pro hac vice*)
chris.studebaker@tkilaw.com
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*Attorneys for Specially Appearing Defendant
Kabushiki Kaisha LegalOn Technologies, f/k/a
Kabushiki Kaisha LegalForce*

Certificate of Service

Based on an agreement to accept service by e-mail, I hereby certify that on June 29, 2023, I served a true and correct copy of Defendant's Objections and Responses to Plaintiff's Fourth Set of Requests for Production by e-mail pursuant to Fed. R. Civ. Proc. 5(b) to the party listed below:

Raj Vasant Abhyanker
LEGALFORCE RAPC WORLDWIDE, P.C.
1580 W. El Camino Real, Suite 10
Mountain View, CA 94040
650-965-8731
Fax: 650-989-2131
Email: raj@legalforcelaw.com
Counsel for Plaintiff LegalForce RAPC Worldwide, P.C.

I hereby certify that I am admitted *pro hac vice* to practice before the United States District Court for the Northern District of California for this case. I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Certificate of Service is true and correct.

Dated: July 29, 2023

/s/Christopher Studebaker
Christopher Studebaker

David A. Makman (SBN 178195)
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Attorneys for Specially Appearing Defendant
Kabushiki Kaisha LegalOn Technologies, f/k/a Kabushiki Kaisha LegalForce

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

LEGALFORCE RAPC WORLDWIDE, P.C.

Plaintiff,

v.

LEGALFORCE, INC.,

Defendant.

CASE NO.: 3:22-cv-03724-TLT

**DEFENDANT'S OBJECTIONS AND
RESPONSES TO PLAINTIFF'S THIRD SET
OF INTERROGATORIES**

1 **PROPOUNDING PARTY:** LegalForce RAPC Worldwide, P.C.

2 **RESPONDING PARTY:** Specially Appearing Defendant *Kabushiki Kaisha* LegalOn Technologies,
3 f/k/a *Kabushiki Kaisha* LegalForce

4 **SET NUMBER:** Three

5 TO PLAINTIFF AND ITS ATTORNEYS OF RECORD:

6 Pursuant to Rules 26 and 33, Federal Rules of Civil Procedure and the Local Civil Rules of the
7 United States District Court for the Northern District of California, Specially Appearing Defendant
8 *Kabushiki Kaisha* LegalOn Technologies, f/k/a *Kabushiki Kaisha* LegalForce (“Defendant”), through
9 its counsel, hereby responds and objects to Plaintiff LegalForce RAPC Worldwide, P.C.’s (“Plaintiff”)
10 Third Set of Interrogatories (the “Interrogatories,” served on June 30, 2023.

11 Defendant provides these Responses, and any document produced in response to the
12 Interrogatories, without waiver of or prejudice to (i) its right at any later time to raise objections as to
13 the relevance, materiality, privilege, work-product character or admissibility as evidence, for any
14 purpose, of (a) the Interrogatories or any part thereof, (b) statements made in these Responses to the
15 Interrogatories or any part thereof, or (c) any information disclosed and/or any documents produced
16 as part of Defendant’s Responses to the Interrogatories or any part thereof; (ii) its right to object to the
17 use of any documents produced in response to these Interrogatories in any subsequent proceedings or
18 the trial of this Action or any other action; or (iii) its right to object on any ground at any time to a
19 demand for further response to these Interrogatories or other discovery requests in this Action. Any
20 response or objection or agreement to search for and produce in response to an individual Interrogatory
21 is not an acknowledgement or concession that the documents sought exist or are in Defendant’s
22 possession, custody or control.

23 Defendant reserves the right to amend or supplement its responses and objections to the
24 Interrogatories from time to time as appropriate.

25 **GENERAL OBJECTIONS**

26 1. The General Objections set forth below apply to the Interrogatories generally and to
27 the Definitions, Instructions and the Individual Interrogatories set forth therein. Unless otherwise
28 stated, the General Objections shall have the same force and effect as if set forth in full response to

1 each Definition and Instruction and Interrogatory. Any undertaking to search for, or provide
2 information or documents in response to, any Interrogatory is made subject to the General Objections.

3 2. Defendant objects generally to the Interrogatories, including the Definitions and
4 Instructions set forth therein, to the extent that they seek to impose burdens or obligations on
5 Defendant that are broader than, inconsistent with or not authorized under the Federal Rules of Civil
6 Procedure, the Local Rules of the United States District Court for the Northern District of California,
7 other applicable rules or laws, or any order entered by the Court in, or applicable to, this Action (the
8 “Applicable Rules”). Subject to and without waiving any Objections, in responding to these
9 Interrogatories, Defendant will construe the Interrogatories in accordance with the Applicable Rules.

10 3. Defendant objects generally to the Interrogatories, including the Definitions and
11 Instructions set forth therein, on the grounds that they seek documents or information that come within
12 the scope of the attorney-client privilege, the work-product doctrine, the common interest or joint
13 defense privilege or any other applicable privilege or immunity, or that otherwise are exempted from
14 disclosure. Defendant hereby claims such privileges and protections to the extent implicated by the
15 Interrogatories and excludes privileged or protected material from its responses to the Interrogatories.
16 Any disclosure of such privileged or protected material in response to the Interrogatories is inadvertent
17 and not intended to waive those privileges and protections. Defendant reserves the right to demand
18 that Plaintiff return, destroy or sequester any privileged or protected documents produced and all
19 copies thereof consistent with the Applicable Rules.

20 4. Defendant objects generally to the Interrogatories, including the Definitions and
21 Instructions set forth therein, to the extent they purport to require Defendant to respond with
22 information without any date restriction and therefore seek information that are not relevant to any
23 party’s claim or defense or proportional to the needs of the case.

24 5. Defendant objects generally to the Interrogatories, including the Definitions and
25 Instructions set forth therein, to the extent that they seek information that is cumulative or duplicative.

26 6. Defendant objects generally to the Interrogatories, including the Definitions and
27 Instructions set forth therein, to the extent that they purport to require Defendant to conduct anything
28 beyond a reasonable and diligent search for readily accessible documents (including electronic

1 documents) from readily available sources (including electronic sources) where responsive documents
2 reasonably would be expected to be found, and to the extent that the Interrogatories purport to require
3 Defendant to exceed its obligations under the Applicable Rules.

4 7. Defendant objects generally to the Interrogatories, including the Definitions and
5 Instructions set forth therein, to the extent that they purport to impose an obligation to produce any
6 information or documents that are newly created or received after the receipt of Interrogatories,
7 because efforts to produce such information or documents would be unduly burdensome and require
8 unreasonable expense.

9 8. Defendant objects generally to the Interrogatories, including the Definitions and
10 Instructions set forth therein, to the extent that they purport to require Defendant to draw subjective or
11 legal conclusions, or are predicated on subjective or legal conclusions or arguments. Subject to and
12 without waiving any objections, Defendant states that any response, production of documents or
13 provision of information in response to the Interrogatories is not intended to provide, and shall not
14 constitute or be construed as providing, an admission concerning any of the terms used in the
15 Interrogatories.

16 9. Defendant objects generally to the Interrogatories, including the Definitions and
17 Instructions set forth therein, to the extent that the Interrogatories, Definitions or Instructions contain
18 inaccurate, incomplete or misleading descriptions of the facts, persons, relationships and/or events
19 underlying the Action. Defendant further objects to the Interrogatories, including the Definitions and
20 Instructions set forth therein, to the extent that they assume the existence of facts that do not exist or
21 the occurrence of events that did not take place. Any response, production of documents or provision
22 of information in response to the Interrogatories is not intended to provide, and shall not constitute or
23 be construed as providing, an admission that any factual predicates stated in the Interrogatories are
24 accurate.

25 10. Defendant objects generally to the Interrogatories to the extent that the Interrogatories
26 purport to require production of information or documents within 30 days on the grounds that such a
27 request is unreasonable and unduly burdensome.

28 11. Defendant object generally to Definition No. 3, defining the term “LegalOn Japan” as

vague, over-broad and, as used in the Interrogatories, calling for material not relevant to claims or defenses of either party to Action to the extent that it encompasses Defendant's "contractors." Unless otherwise stated, Defendant will interpret "You", "Your" and "LegalOn Japan" to include only *Kabushiki Kaisha LegalOn Technologies*, f/k/a *Kabushiki Kaisha LegalForce* and its employees.

SPECIFIC OBJECTIONS AND RESPONSES

Defendant submits the following Specific Objections and Responses to the Interrogatory. The absence of a Specific Objection to an Interrogatory is not an admission that information responsive to the Interrogatory exists. Moreover, Defendant hereby incorporates its General Objections into the Responses to the Interrogatory set forth below.

INTERROGATORY NO. 25:

Documents sufficient to show the amount of venture capital that You have raised from investors headquartered in the United States of America.

RESPONSE TO INTERROGATORY NO. 25:

Defendant objects to this Interrogatory to the extent that it seeks information protected by attorney work product and/or attorney-client privilege. Defendant additionally objects to this Interrogatory based on the grounds that it is premature, call for production of confidential and proprietary information and documents absent entry of a stipulated protective order, and call for electronically stored information absent entry of a stipulated order regarding discovery of electronically stored information for litigation. Defendant further objects to this Interrogatory with respect to the language "venture capital" and "headquartered" based on the grounds that it overly broad and unduly burdensome as it is not limited in the subject matter, not limited to the U.S. jurisdiction, and not tied to the claims or defenses in this case. Defendant further objects to this Interrogatory as vague and ambiguous with respect to the language "venture capital" and "headquartered" on the grounds that it relies on the interpretation of terms that are undefined. Defendant objects to this Interrogatory to the extent that it falsely suggests that Defendant had any plan or activity to enter the U.S. market using the LEGALFORCE name or mark. Defendant further objects to this Interrogatory as it is compound and assumes facts not in evidence and calling for speculation when it asks Defendant to identify the supposed headquarters of its investors. Defendant further objects to this Interrogatory

1 in that it calls for highly confidential information—the specific amounts invested by specific
2 investors—when there is no protective order in this action.

3 Defendant also objects to the Interrogatory given that jurisdictional discovery has closed and/or
4 is inappropriate pending a determination from the Court whether it has Article III jurisdiction here.

5 Defendant will withhold responding to this Interrogatory on these bases.

6
7
8 Dated July 29, 2023

By: /s/Christopher Studebaker
Christopher Studebaker (admitted *pro hac vice*)
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18 *Attorneys for Specially Appearing Defendant*
19 *Kabushiki Kaisha LegalOn Technologies, f/k/a*
20 *Kabushiki Kaisha LegalForce*

Certificate of Service

Based on an agreement to accept service by e-mail, I hereby certify that on June 29, 2023, I served true and correct copies of Defendant's Objections and Responses to Plaintiff's Third Set of Interrogatories by e-mail pursuant to Fed. R. Civ. Proc. 5(b) to the party listed below:

Raj Vasant Abhyanker
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Fax: 650-989-2131
Email: raj@legalforcelaw.com
Counsel for Plaintiff LegalForce RAPC Worldwide, P.C.

I hereby certify that I am admitted *pro hac vice* to practice before the United States District Court for the Northern District of California for this case. I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Certificate of Service is true and correct.

Dated: July 29, 2023

/s/Christopher Studebaker
Christopher Studebaker